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| UNITED STATES OF AMERICA | : | CRIMINAL NO. _____ |
| v. | : | DATE FILED: _____ |
| PAUL J. BROWN | : | VIOLATIONS: |
| | : | 18 U.S.C. § 2252(a)(4)(B) |
| | : | (possession of child pornography - 1 count) |
| | : | 18 U.S.C. § 2252(a)(2) |
| | : | (receipt of child pornography - 1 count) |
| | : | 18 U.S.C. § 2252(a)(1) |
| | : | (transporting and shipping of child pornography |
| | | - 1 count) |
| | | Notice of forfeiture |

COUNT ONE

1. At all times material to this indictment, defendant Paul J. Brown resided in Radnor, Pennsylvania.
2. On or about June 9, 2004, in Radnor, in the Eastern District of Pennsylvania, defendant

knowingly possessed approximately 1,325 images of child pornography, and other matter, namely computer hard drives, which contained visual depictions that had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about March 2, 2003 until on or about September 5, 2003, in Radnor, in the Eastern District of Pennsylvania, and elsewhere, defendant

PAUL J. BROWN

knowingly received visual depictions that had been shipped in interstate and foreign commerce, which visual depictions showed minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about March 2, 2003 until on or about September 5, 2003, in Radnor, in the Eastern District of Pennsylvania, and elsewhere, defendant

PAUL J. BROWN

knowingly transported and shipped in interstate and foreign commerce approximately thirteen visual depictions, showing minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 2252(a)(1), 2252(a)(2), and 2252(a)(4)(B) set forth above, defendant

PAUL J. BROWN

shall forfeit to the United States of America the following:

- a. Any visual depiction described in § 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of 18 U.S.C. § 2252;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such an offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to:
 - one IBM Thinkpad laptop computer, serial number 78GPACR, containing images of child pornography;
 - one Maxtor external hard drive, serial number Y4QTY8E, containing images of child pornography;
 - one Dell desktop computer, serial number 2K5M00B, containing images of child pornography;
 - one Dell Dimension desktop computer, serial number 3X7L441, containing images of child pornography;
 - one Western digital hard drive, serial number WCAEK - 1261369, containing images of child pornography;

- one Quantum hard drive, serial number 134920770099, containing images of child pornography;
- one Archos storage device, serial number 005200877, containing images of child pornography;
- one IBM ThinkPad laptop computer, serial number 78-KXCB9; and,
- one Compaq server, serial number 0929CSF1A384, containing images of child pornography.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**